

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

United States of America

v.

Kevin Shane BRADBURY

Case No.

7:19-MJ-00012

Defendant(s)

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

JAN 18 2019

BY: JULIA C. DUDLEY, CLERK  
DEPUTY CLERK

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 17, 2019 in the county of Roanoke in the  
Western District of Virginia, the defendant(s) violated:

Code Section

Offense Description

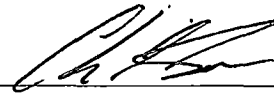
21 U.S.C. 841 (a)(1) and 841 (b)(1)  
(B)

Possession with the intent to distribute 5 grams or more of methamphetamine

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.



Complainant's signature

Charles Sanders, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

January 18, 2019

City and state:

Roanoke, Virginia



Judge's signature

Robert S. Ballou, U.S. Magistrate Judge

Printed name and title

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

UNITED STATES OF AMERICA

v.

Kevin Shane BRADBURY

7:19-MJ-00012

Case No. \_\_\_\_\_

**FILED UNDER SEAL**

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Charles Sanders, being first duly sworn, hereby depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a complaint and arrest warrant under Rules 3, 4, and 4.1 of the Federal Rules of Criminal Procedure.

2. I am a Special Agent with the Drug Enforcement Administration (DEA) and have been so-employed since 2014. I am currently assigned to investigate drug trafficking organizations as a member of the DEA, Washington Field Division/Roanoke Resident Office. My duties as a Special Agent involve the investigation of various criminal activities of narcotics traffickers and their associates. In investigating these matters, I have acted as a case agent, an undercover agent, and a contact agent for confidential sources. These investigations have resulted in the issuance of federal search warrants, seizure warrants, indictments, and convictions of persons for federal narcotics violations. During my employment as a DEA Special Agent, I have received multiple hours of training in narcotics enforcement, money laundering techniques, and investigative techniques, and I have personally participated in numerous investigations. I have closely assisted with a Title III investigation during surveillance operations and within the wire room. Furthermore, I have authored the initial and extension affidavit regarding a Title III interception

of wire and electronic communications. I have also spoken on numerous occasions with informants, suspects, and other experienced narcotics traffickers concerning the methods and practices of drug traffickers, including the methods and practices used by traffickers of methamphetamine, heroin, and cocaine.

3. The facts in this affidavit come from my personal observations, my training and experience, as well as information obtained from other law enforcement officers. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. This affidavit is submitted in support of the following: a criminal complaint and arrest warrant charging Kevin Shane BRADBURY (hereinafter "BRADBURY") with possession with the intent to distribute 5 grams or more of methamphetamine, a schedule II controlled substance, in violation of 21 U.S.C. § 841.

#### **PROBABLE CAUSE**

5. On or about January 17, 2019, investigators with the Roanoke Valley Regional Drug Unit (HIDTA) conducted surveillance at the residence of BRADBURY, in the county of Roanoke, which is within the Western District of Virginia. On the same date, investigators observed a vehicle make several passes on the street in front of BRADBURY'S residence and then stop in the roadway in front of the residence. Investigators observed an individual fitting the description of BRADBURY exit the residence and walk to a vehicle that had just arrived. BRADBURY walked to the passenger side of the vehicle for approximately five seconds and then returned to the residence. A short time later, BRADBURY was observed exiting the residence with an unknown individual and entering a black Honda, Virginia registration UWS-9365, that BRADBURY acknowledged belonged to him. Investigators observed BRADBURY

to be driving the vehicle and it was known that his driver's license was revoked. Investigators coordinated a traffic stop on BRADBURY at 5002 Plantation Road, Roanoke, Virginia, for a license plate violation and vehicle registration violation. The Roanoke County police officer conducting the traffic stop asked BRADBURY to exit his vehicle. BRADBURY was asked for consent to search his person, which he consented to. As the police officer was conducting a search of BRADBURY'S person, the officer observed that BRADBURY'S buttocks was tense. BRADBURY told the officer that he had drugs clinched in his buttocks. The officer located approximately 17 grams of methamphetamine and .7 grams of heroin in the buttocks of BRADBURY. Officers conducted a search of BRADBURY'S vehicle and subsequently located an additional approximate 16.9 grams of methamphetamine and 1.8 grams of heroin under the hood of BRADBURY'S vehicle near the windshield wipers. A set of electronic scales was also located under the hood with the methamphetamine and heroin. All of the substances field-tested positive for the presence of either methamphetamine or heroin.

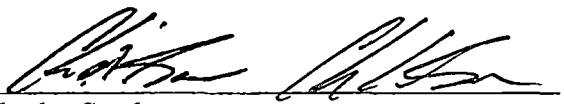
6. On the same date, BRADBURY was transported to the DEA Roanoke Resident Office where investigators conducted a post-Miranda interview of BRADBURY. During the interview, BRADBURY stated to investigators that he purchased methamphetamine due to his habit and for re-distribution. BRADBURY further explained that he was sometimes "fronted" a portion of the price of the methamphetamine and that he re-distributes one-quarter (1/4) ounce quantities of methamphetamine to his friends.

7. The vast majority of recent methamphetamine seizures in the Roanoke Valley by law enforcement has yielded purity levels in excess of 90%. Based on this information, it is believed that the methamphetamine that BRADBURY is charged with will be of a similar purity level.

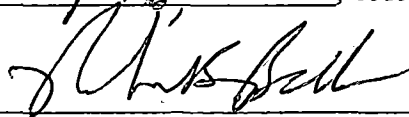
**CONCLUSION**

8. Based on my knowledge, training, and experience, the preceding information set forth in this Affidavit constitutes probable cause that BRADBURY violated Title 21, United States Code, Section 841(a)(1).

Respectfully submitted,

  
Charles Sanders  
Special Agent  
Drug Enforcement Administration

Subscribed and sworn to before me on  
 18, 2019

  
ROBERT S. BALLOU  
UNITED STATES MAGISTRATE JUDGE